

**Delaware
Division of
Air Quality**

2011

Air Toxics Strategic Plan

Mid-year Status

(January through June 2011)

Detailed Report

Delaware
Division of Air Quality
2011 Air Toxics Strategic Plan

The Air Toxics Strategic Plan (ATSP) is a five-year plan of activities to be undertaken by Division of Air Quality (DAQ) and its partners to reduce the risk of adverse health effects caused by the inhalation of air toxics.

The 2011 - 2015 ATSP, finalized on December 28, 2010, is organized within the following components.

- **Implement an on-going program to address the risks from exposure to air toxics**
- **Build a greater understanding of ambient air toxics in the environment**
- **Identify potential harm from exposure to air toxics**
- **Gather information related to air toxics sources**
- **Identify options for reducing air toxics in the environment**
- **Implement appropriate actions to reduce the harm from exposure to air toxics**
- **Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics**
- **Enhance DAQ air toxics resources**

ACRONYMS

AFS	EPA's Air Facility System
ATSP	Air Toxics Strategic Plan
CAA	Clean Air Act
CMAQ	Congestion Mitigation and Air Quality Improvement Program
DAQ	Delaware Division of Air Quality
DATAS	Delaware Air Toxics Assessment Study
DE	Delaware
DelDOT	Delaware Department of Transportation
DE&C	Delaware Division of Energy & Climate
DENs	Delaware Environmental Navigator
DNREC	Delaware Department of Natural Resources and Environmental Control
EPA	U. S. Environmental Protection Agency
EPA R3	U. S. Environmental Protection Agency Region 3
GACT	Generally Achievable Control Technology
HAPs	Hazardous Air Pollutants, as defined in Section 112(b) of the 1990 Amendments to the Clean Air Act
MACT	Maximum Achievable Control Technology
MARAMA	Mid-Atlantic Regional Air Management Association
MPO	Metropolitan Planning Organization
NAAQS	National Ambient Air Quality Standard
NACAA	National Association of Clean Air Agencies
NATA	EPA's National Air Toxics Assessment
OTC	Ozone Transport Commission
VOC	Volatile Organic Compound
WILMAPCO	Wilmington Area Planning Council

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	Implement an ongoing program to address the risks from exposure to air toxic	6/30/11 Status	Expected Completion
2011	1. Continue to build the strategic planning capacity to implement risk-based assessment programs to mitigate any unacceptable air toxics impacts.		
	a. Review status and complete year-end status report on the 2010 individual Strategic Plans.	• Completed on 2/22/11	---
	b. Track implementation and report year-end-status of the 2010 Air Toxics Strategic Plan by 3/31/11.	• Completed on 3/15/11	---
	c. Review status and complete mid-year status report on the 2011 individual Strategic Plans.	• No activity this period	• 9/11
	d. Track implementation and report mid-year status on the 2011 Air Toxics Strategic Plan by 9/30/11.	• Prepared and provided mid-year report templates to initiate activity on June 8	• 9/11
	e. Updating of the Air Toxics Strategic Plan for 2012-2016		
	i. Review and revise, if needed, Air Toxics Area Source Program and timing, as part of the 2012 Air Toxics Strategic Plan by 10/11.	• No activity this period	• 11/11
	ii. Coordinate development of the 2012 Air Toxics Strategic Plan.	• No activity this period	• 12/11
	iii. Update individual Strategic Plans for 2012-2016.	• No activity this period	• 12/11
	iv. Update and finalize 2012 Air Toxics Strategic Plan for years 2012 to 2016 by 12/31/11.	• No activity this period	• 12/11
	2. Continue participation on internal, local, regional, and national committees to identify air quality problems, develop strategies/solutions, and implement DE air toxics program.	• Continued participation on the NACAA Air Toxics Committee	• Ongoing
	3. Continue participation on internal, local, regional, and national committees to identify air quality problems related to small businesses, develop strategies/solutions, and implement in the DE air toxics program and small business assistance program.	• No activity, Small Business Ombudsman on leave of absence during this period	• Ongoing
	4. Continue participation on internal, local, regional, and national committees to identify energy issues, develop strategies/solutions, and implement Delaware's energy program.	• Continued participation in : • Clean Cities/States Program (Alt. Fuels) • National Association of State Energy Officials (NASEO) • Regional Greenhouse Gas Initiative (RGGI) • Transportation & Climate Initiative • Three Region Initiative	• Ongoing
	5. Identify regulatory deficiencies, implementation problems, and training needs and recommend appropriate solutions.		
	a. Complete Regulatory Timeline and Guidance documentation by 3/11.	• Completed on 5/31/11	---

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	Implement an ongoing program to address the risks from exposure to air toxic	6/30/11 Status	Expected Completion
2011 Cont	6. Continue to evaluate and realign Engineering and Compliance's assignments, organization structure and protocols to better address risk-based air toxics programs, as needed.	• No needed changes or realignments were identified during this period	• Ongoing
	7. Review and revise, if needed, air toxics area source activities and timing as part of the 2012 Air Toxics Strategic Plan by 12/11.	• No activity this period	• 11/11
	8. Continue to evaluate and realign Area Source Compliance's assignments and organization structure to better address risk-based air toxics programs, as needed.	• Completed hire of new employee; group is now fully staffed	• Ongoing

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	Build greater understanding of ambient air toxics environment	6/30/11 Status	Expected Completion
2011	1. Determine ambient air toxics concentrations for selected HAPs in Delaware.		
	a. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.	• Sampling is on schedule.	• Ongoing
	b. Submit quarterly air toxics monitoring data to national AIRS-AQS database following data validation.	• Sampling is on schedule, reporting is dependent on receiving data from analytical laboratories.	• Ongoing
	c. Continue to collaborate with University of Delaware on air toxics research and special projects.	• No active projects currently scheduled.	- - -
	d. Working in partnership with the University of Delaware, continue the Upper Air Profiler project, which provides meteorological data to NOAA repository for potential use in air toxics modeling, etc.	• Units have been conveyed to DNREC. Partnership has been established. Communication with 10-meter tower is active. Profiler needs to be connected to the system.	• Ongoing
	e. Continue to operate the gas chromatographic mass spectrometer to quantify “Community Air Toxics”.	• 6-months remaining on project. Sampling continues. Data validation and analysis is actively underway.	• 12/11
	f. Continue to identify funding requirements and sources, as well as, staffing needed to fully utilize the air toxics analytical lab.	• Completed as part of the DAQ Needs Assessment.	• Ongoing
	g. Continue to support the gas chromatographic mass spectrometer platform operations and maintenance.	• Activities are on schedule.	• Ongoing
	h. Undertake new or special monitoring needs that may surface.	• In May, submitted a proposal to EPA under their Community Air Toxics Request for Proposals for a community-based sampling project at the Port of Wilmington to characterize methyl bromide concentrations in ambient air.	• Project pending grant decision
	2. Provide air toxics modeling support to meet community and internal needs.	• Finalization of DATAS Phase 2 project in progress	• 4Q/11

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	Identify potential harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011	1. Characterize the cancer and non-cancer risks associated with 2005 National Air Toxics Assessment (2005 NATA).		
	a. Review 2005 NATA findings and assess potential impact of dry cleaning and gasoline distribution air toxics on the public's health, as needed.	• Review did not identify notable impact from either source category	- - -
	b. Complete evaluation of the 2005 NATA results, communicate findings, if warranted, and respond to inquiries, as appropriate.	• Completed evaluation and communicated results to DAQ management and other interested parties on January 31 • No inquiries were received that required response	- - -
	c. Review communication materials associated with the release of EPA's NATA 2005 results for Delaware, as needed.	• Communicated results to DAQ management and other interested parties on January 31 • No inquiries were received that required response	- - -
	2. Characterize the cancer and non-cancer risks through future air toxics assessment programs.		
	a. Coordinate ongoing risk assessment support and guidance of Division of Public Health (DPH) for air toxics risk reduction activities.	• No activity this period	• Ongoing
	3. Provide modeling support to Air Quality's Community Air Toxics Study (CATS), pending the completion of the CATS.	• No modeling needs identified during this period	• Ongoing
	4. Provide modeling support to Engineering & Compliance associated with risk-based permitting decisions, as needed.	• No air toxics modeling needs identified during this period	• Ongoing
	5. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate.		
	a. Analyze ultra-fine particle data collected by DNREC, University of Delaware, and Duke University.	• Completed preliminary analyses of ultra-fine particle data collected at the Martin Luther King monitoring station by DNREC and presented interim findings on January 23 • Data and findings were distributed internally and shared with John Hopkins and University of Delaware	• Ongoing

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	Identify potential harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	5. Analyze monitoring data from completed special monitoring projects and refine air toxics model, if appropriate		
	b. Continue source apportionment analysis focusing on the air toxics of concern.		
	i. Risk contribution of mobile sources, as resources become available.	• On hold pending availability of resources	• Unknown
	ii. Diesel particulate matter, as resources become available.	• On hold pending availability of resources	• Unknown
	iii. Residential wood stoves, as resources become available.	• On hold pending availability of resources	• Unknown
NEW	6. Coordinate with Division of Public Health (DPH) on the finalization of DATAS Phase 2.	• Identified and communicated the additional risk assessment needs to DPH	• 4Q/11

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	Gather information related to air toxics sources	6/30/11 Status	Expected Completion
2011	1. Develop emissions inventory protocol for the implementation of the 2011 National Emissions Inventory, if needed.	• No activity this period	• 12/11
	2. Provide emissions inventory support to the air toxics education and reduction programs, as required.	• No activity this period	• Ongoing
	3. By 12/11, identify and enter into AFS all new or previously unknown affected sources which are subject to any area source standards promulgated under 112(d) or 112(k) of the CAA.	• No activity this period	• 12/11
	4. Identify the miscellaneous parts and products manufacturing facilities that are subject to the area source paint stripping (1138 Sect 13) and area source surface coating (1138 Sect 14) requirements in Regulation 1138.		
	a. Provide compliance guidance to known and probable affected sources for their self-determination of applicability by 3/11.	• No activity this period; need for internal training identified; training to be provide in November	• 4Q11
	b. Perform an applicability assessment at known and probable affected sources to determine those facilities that are subject to Section 13 and/or Section 14 by 6/11.	• No activity this period; need for internal training identified; training to be provide in November	• 4Q11
	5. Until data entry problems with AFS (via DENs) are resolved, continue to improve the consolidated source data base by entering all new or previously unknown affected sources which are subject to Perchloroethylene Dry Cleaning standard (1138 Sect 5), Methylene Chloride Paint Stripping standard (1138 Sect 13), and Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15), as well as gasoline delivery vessels.	• Continued to maintain and update manual database of affected Delaware sources	• Ongoing
	6. Submit UST Semiannual Activities Reports to the EPA by April 30 and October 31, 2011.	• Submitted Semiannual Activities Report in April	• 10/11
	7. Assist in the identification of known or potentially affected sources for newly promulgated area source standards, as needed.	• No activity this period • New area sources standard (Sub 7Es) promulgated on 2/17/11; no Delaware sources	• Ongoing
	8. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.	• No activity this period	• Ongoing

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	Identify options for reducing air toxics in the environment	6/30/11 Status	Expected Completion
2011	1. Continue to monitor federal activities associated with the new Lead NAAQS and communicate any EPA proposed actions/decisions impacting Delaware.	<ul style="list-style-type: none"> No activity needed during this period 	<ul style="list-style-type: none"> Ongoing
	2. Provide technical assistance on lightering operations to DAQ and Ozone Transport Commission, as needed.	<ul style="list-style-type: none"> Completed review of an October 21, 2010 proposed Coast Guard rule applicable to marine vapor control systems on April 14 <ul style="list-style-type: none"> Concluded the proposed CG rule would have negligible impact on lightering in Delaware and did not create any conflict with existing Delaware regulations 	<ul style="list-style-type: none"> Ongoing
	3. Initiate and continue to include, where applicable, the mobile source air toxics issues in programs and activities, which previously addressed only criteria pollutants.		
	a. Participate in inter-agency consultation workgroup's 8-hour conformity determinations for New Castle, Kent and Sussex Counties. Report status to EPA R3, as appropriate.	<ul style="list-style-type: none"> Participated in monthly WILMAPCO Air Quality Subcommittee meetings 	<ul style="list-style-type: none"> Ongoing
	b. Continue to provide comments and/or recommendations to the MPOs and DelDOT on the priority of funding projects with CMAQ funds. Report status to EPA R3, as appropriate.	<ul style="list-style-type: none"> Continued to provide Department's priorities on funding projects at WILMAPCO Air Quality Subcommittee meetings 	<ul style="list-style-type: none"> Ongoing
	c. Reevaluate the "Smoking Vehicle Reduction Program" options.		
	i. Complete baseline testing of smoking vehicles program.	<ul style="list-style-type: none"> ON HOLD; due to lack of resources 	<ul style="list-style-type: none"> Unknown
	ii. Review baseline testing results and identify funding of program, if implementation is warranted.	<ul style="list-style-type: none"> ON HOLD; due to lack of resources 	<ul style="list-style-type: none"> Unknown
	4. Continue participation in OTC Clean Corridors and the Mid Atlantic Diesel Collaborative (MADC) projects and report status to EPA R3, if appropriate.	<ul style="list-style-type: none"> Participated on MADDC projects 	<ul style="list-style-type: none"> Ongoing
	5. Continue working with EPA R3 and the Clean Air Council on an outreach program for the Delaware Diesel Difference initiative.	<ul style="list-style-type: none"> On hold, pending Clean Air Council's replacement of the Clean Diesel & Community Health Coordinator 	<ul style="list-style-type: none"> Ongoing
	6. Continue to promote smart growth oversight that encourages consideration of impact of mobile source emissions.	<ul style="list-style-type: none"> Continued to review and comment on Preliminary Land Use Service (PLUS) applications 	<ul style="list-style-type: none"> Ongoing

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	Identify options for reducing air toxics in the environment	6/30/11 Status	Expected Completion
2011 Cont	7. Continue to evaluate federal stationary source rulemakings, communicate impacts internally and provide comments on the rules, as appropriate. Collaborate and maintain open communications with rulemaking involving joint responsibilities.		
	a. Newly proposed amendments to federal air toxics and incinerator standards.		
New	i. Electric Generating Unit MACT Standard (Sub UUUUU).	<ul style="list-style-type: none"> • Completed review of Federal Sub 5Us • Comments being prepared 	- - - • 8/11
	ii. PVC MACT standard (Sub HHHHHHH).	<ul style="list-style-type: none"> • Reviewed from a permitting and compliance perspective; no comments warranted 	- - -
	b. Newly proposed federal residual risk standards.		
	i. Aerospace Manufacturing and Rework Facilities (Sub GG).	<ul style="list-style-type: none"> • No EPA proposed rule to date 	<ul style="list-style-type: none"> • Unknown
	ii. Secondary Aluminum Production (Sub RRR).	<ul style="list-style-type: none"> • No EPA proposed rule to date 	<ul style="list-style-type: none"> • Unknown
	8. Participate in development of the rulemaking strategy for		
	a. Reevaluate and develop path forward for amending Regulation 1131, which would expand the low enhanced inspection and maintenance (I/M) program statewide by 6/11.	<ul style="list-style-type: none"> • Reevaluation complete; determination of path forward in progress 	<ul style="list-style-type: none"> • Ongoing
	b. Area standard applicable to gasoline dispensing facilities (Federal Sub CCCCCC), if needed.	<ul style="list-style-type: none"> • On hold – the Division of Air Quality has postponed the adoption of Federal Subpart 6Cs requirements 	<ul style="list-style-type: none"> • Unknown
	9. Implement other air toxics-related communications and outreach programs.		
	a. Continue to participate in Claymont Coalition meetings.	<ul style="list-style-type: none"> • Successfully rolled out latest Claymont dust study findings at the May 24 annual public meeting 	<ul style="list-style-type: none"> • Ongoing
	b. Continue to support Engineering and Compliance's community/industrial air toxics outreach programs, when needed.	<ul style="list-style-type: none"> • No new needs were identified during this period 	<ul style="list-style-type: none"> • Ongoing
	10. Identify grant and funding opportunities.		
	a. Facilitate the identification, preparation and submission for transportation-related grants or other funding.	<ul style="list-style-type: none"> • Submitted 2011 Diesel Emissions Reduction Act (DERA) grant application, which was approved in June 	<ul style="list-style-type: none"> • Ongoing
	b. Work with and promote open communications with other branches, divisions and Department on energy efficiency/conservation opportunities and pursue funding opportunities for projects.	<ul style="list-style-type: none"> • Continue to promote open communications 	<ul style="list-style-type: none"> • Ongoing

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	Identify options for reducing air toxics in the environment	6/30/11 Status	Expected Completion
2011 Cont	11. Evaluate the need for the development of additional Source Category Permits to address air toxics issues.	<ul style="list-style-type: none"> • No new candidates identified during this period 	<ul style="list-style-type: none"> • Ongoing
	12. Continue to participate in the multi-state Transportation & Climate Initiative (TCI).	<ul style="list-style-type: none"> • The TCI “Innovation, Communication & Technologies” began development a smart phone “APP Store” for transit-oriented APPs throughout the 11-State region • The TCI “Clean Vehicles & Fuels” workgroup submitted a Clean Cities/USDOE grant request for research and to do planning to establish electric vehicle infrastructure in the 11-State region; the grant was subsequently awarded 	<ul style="list-style-type: none"> • 2012 • Ongoing

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011	1. Insure continued or improved compliance of stationary sources.		
	a. Continue to perform full compliance evaluations (FCEs) of facilities subject to major air toxics source standards (i.e. MACT and residual risk standards) in accordance with the applicable compliance monitoring plan.	• Completed 5 additional FCE during this period	• 10/11
	b. Perform full compliance evaluations (FCEs) of facilities subject to area source air toxics standards as follows:		
	i. The three (3) chrome plating facilities, subject to 1138 Sect 6, covered during the 2010-11 timeframe.	• Completed 2 of the 3 in 2010	• 10/11
	ii. The one (1) halogenated solvent degreaser, subject to 1138 Sect 8, covered during the 2010-11 timeframe.	• Completed on January 20	- - -
	iii. The one (1) hazardous waste combustor, subject to Federal Sub EEE, covered during the 2010-11 timeframe.	• No activity this period	• 10/11
	iv. The three (3) municipal solid waste landfills, subject to Federal Sub AAAA, covered during the 2010-11 timeframe.	• Completed in 2010	- - -
	v. The two (2) hospital ethylene oxide sterilization facilities, subject to 1138 Sect 9, covered during the 2010-11 timeframe.	• No activity this period	• 10/11
	vi. The one (1) lead acid battery manufacturing plant, subject to 1138 Sect 11, covered during the 2010-11 timeframe.	• Completed in 2010	- - -
	vii. The two (2) plating and polishing facility, subject to 1138 Sect 10, covered during the 2010-11 timeframe.	• No activity this period	• 10/11
	viii. The one (1) source, subject to electric arc furnace (Federal Sub YYYYYY), covered during the 2010-11 timeframe.	• No activity this period	• 10/11
	c. By 9/11, perform compliance evaluations (CE) at area air toxics sources as follows:		
	i. 25% or ~20 perchloroethylene dry cleaning facilities subject to 1138 Sect 5; total population is ~80 facilities.	• Completed 51 compliance evaluations (or ~64% of current population) during this period	• 9/11
	ii. 25% or ~40 motor vehicle and mobile equipment surface coating facilities subject to 1124 Sect 11; total population is ~160 facilities.	• Completed 1 compliance evaluations (or <1% of current population) during this period	• 9/11
	iii. 10% or ~60 gasoline delivery vessels (GDVs); total population is ~600 facilities.	<ul style="list-style-type: none"> • Completed perceptible leak tests during delivery transfers at gasoline stations on 62 GDVs (or ~10% of the permitted GDVs) during this period • Continued to provide compliance assistance to GDV fleet owners in meeting annual testing and permitting requirements 	<ul style="list-style-type: none"> • 9/11 • Ongoing

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	d. Track annual testing of Stage II vapor recovery system for gasoline dispensing facilities that are subject to vapor balancing requirements of Regulation 1124.	<ul style="list-style-type: none"> Tracked the vapor recovery system testing of 192 GDFs (~54% of current GDFs) 	<ul style="list-style-type: none"> Ongoing
	e. Conduct inspections at one third (1/3) of the regulated gasoline dispensing facilities, subject to Regulation 1124, during 2011; total population is ~355 facilities.	<ul style="list-style-type: none"> Conducted inspections at 65 regulated GDFs (~18% of regulated GDFs) 	<ul style="list-style-type: none"> Ongoing
	f. Continue to implement the Asbestos Demolition/Renovation Program.		
	i. Perform inspections at asbestos demolition sites.	<ul style="list-style-type: none"> Completed 262 site inspections during this period 	<ul style="list-style-type: none"> Ongoing
	ii. Monitor and maintain the Delaware Online Asbestos Notification System (DOANS).	<ul style="list-style-type: none"> Continued to <ul style="list-style-type: none"> Edit the active user database Provide data entry for new notifications 	<ul style="list-style-type: none"> Ongoing
	iii. Educate the public, certified contractors, and professional service firms on the proper removal and disposal of asbestos.	<ul style="list-style-type: none"> Provided pertinent information in all three counties <ul style="list-style-type: none"> State Service Centers Appropriate county building (i.e. building permits; building code compliance, etc) 	<ul style="list-style-type: none"> Ongoing
	g. Incorporate updated MACT and Residual Risk requirements in air permits.		
	i. Renew expiring Title V permits to incorporate newly promulgated MACT and Residual Risk standards, as needed.	<ul style="list-style-type: none"> Dassault Falcon permit renewal went draft on April 10 DuPont Experimental Station permit renewal went draft on June 19 	<ul style="list-style-type: none"> Ongoing
	ii. Incorporated area source standard requirements during renewal or reopening of Title V permits for		
	1. Claymont Steel to include the Electric Arc Furnace (Federal Sub YYYYYY) requirements by 3/11.	<ul style="list-style-type: none"> Federal Sub YYYYYY requirements being incorporated during permit development 	<ul style="list-style-type: none"> 9/11
	2. Miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements, if applicable.	<ul style="list-style-type: none"> No activity during this period; special training to provide in 3rd or 4th quarter 	<ul style="list-style-type: none"> Ongoing
	iii. Reopen Title V permits for cause to incorporate promulgated MACT and Residual Risk standards consistent with the requirements of Regulation No. 1130, as needed.	<ul style="list-style-type: none"> No permits needed to be reopened during this period 	<ul style="list-style-type: none"> Ongoing

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	h. Continue discussions for additional reduction of multi-pollutants (incl. Hg) from Electrical Generating Units (EGUs) under 25MW.	• Receive permit application from NRG (Dover) to remove coal combustions and add selective catalytic reduction device and heat recovery steam generator	• 4Q11
	i. Incorporate area source standard requirements into natural and synthetic minor source permits, including		
	i. Johnson Controls to include Lead Acid Battery Manufacturing Plant (1138 Sect 11) requirements by 6/11.	• No activity this period; lower priority activity	• TBD
	ii. St. Francis Hospital to include Hospital Ethylene Oxide Sterilizers (1138 Sect 9) requirements by 6/11.	• No activity this period; lower priority activity	• TBD
	iii. Industraplate to include Plating and Polishing Operations (1138 Sect 10) requirements by 12/11.	• No activity this period; lower priority activity	• TBD
	iv. Standard Engineering to include Plating and Polishing Operations (1138 Sect 10) requirements by 12/11.	• No activity this period; lower priority activity	• TBD
	v. Any new miscellaneous parts and products manufacturing facilities to include paint stripping (1138 Sect 13) and surface coating (1138 Sect 14) requirements, if applicable.	• No activity this period; lower priority activity	• TBD
	vi. Existing Perchloroethylene Dry Cleaning facilities (1138 Sect 5) by 12/11.	• No unpermitted existing sources found during this period	• Ongoing
	vii. New Perchloroethylene Dry Cleaning facilities (1138 Sect 5).	• No new dry cleaning facilities identified during this period	• Ongoing
	j. Continue Compliance Assistance Program consistent with the Compliance Assistance Oversight Plan for		
	i. Sources subject to the Motor Vehicle and Mobile Equipment Surface Coating standard (1138 Sect 15).	• Provided compliance assistance to 1 autobody shop during this period	• Ongoing
	2. Promote the implementation of mobile source air toxics reduction initiatives/programs.		
	a. Working with other State and Regional agencies, actively promote implementation of the SmartWay Transport programs.	• On hold, pending Federal funding for SmartWay programs	• Unknown

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	b. Continue to support of the SmartWay Transport programs, as appropriate.		
	i. Complete Smyrna Rest Stop Electrification project by 3/11.	• Completed on March 21	- - -
	ii. Continue to monitor DelDOT's installation of the I-95 Service Plaza Electrification project.	• Requested use data since facility opening on June 28	• Ongoing
	iii. Continue to monitor and report on activities conducted in support of the SmartWay Transport programs, as appropriate.	• In January, the Freight Workgroup of Transportation & Climate Initiative (TCI) revised their work plan to include SmartWay Transport initiatives	• Ongoing
	c. Explore contribution of mobile source air toxics emissions to the health risk using existing information available from DATAS and/or NATA, when or if available.	• NATA 2005 results indicated that mobile source air toxics contribute to health risks; however the secondary atmospheric reactions appear to play a larger role than the direct emissions • DATAS Phase 2 report was not complete	- - - • 4Q11
	d. Continue to identify mobile source air toxics reduction or education programs, if mobile source-driven hot spots are found.	• No mobile source-driven hot spots identified during the period	• Ongoing
	3. Implement other air toxics-related communications and outreach programs.		
	a. Continue to implement a diesel anti-idling educational program.		
	i. Evaluate and revise anti-idling outreach programs, as needed.	• ON HOLD; due to lack of resources	• Unknown
	ii. Conduct anti-idling outreach programs for schools and report status to EPA R3, as appropriate.	• Conducted school bus anti-idling surveys between April and June; collation of results is underway	• 9/11
	iii. Conduct anti-idling outreach programs for the trucking industry and report status to EPA R3, as appropriate.	• Drafted a promotional letter to encourage trucking companies to use the Smyrna electrification facility	• 9/11
	iv. Explore for new audiences to expand the anti-idling outreach program.	• No activity this period	• Ongoing
	v. Participate with the Ozone Transportation Commission (OTC) in the development of an OTC non-road anti-idling model rule.	• Model rule submitted to OTC directors in June for their approval	• Ongoing
	b. Provide the DAQ's Community Air Toxics study team with communication/outreach options by 12/11.	• No activity this period	• Ongoing

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	c. Continue to improve compliance with Delaware's open burning requirements.		
	i. Continue to evaluate and update open burning information, such as the inclusion of Reg. 1119 requirements, on Delaware's open burning website and in Delaware's education materials.	• Commenced redesign and update of the open burning website	• 12/11
	ii. Continue to educate the public on Delaware's open burning restrictions.	• Working directly with local fire companies on implementation issues	• 9/11
	4. Provide support to small businesses on air toxics related issues.	• Provided air toxics support to small business on an as-requested basis	• Ongoing
	5. Continue to enhance the value and use of the air toxics information on DAQ's web sites.		
	a. Continue to provide pertinent and timely information to the public and regulated community on DAQ's "Proposed Regulations" web site during the adoption of new air toxics standards.	• Continuing to update the regulatory web site for the adoption of an amendment to Section 8 of Reg. 1138 (Halogenated solvent cleaning), as new regulatory information becomes available	• 12/11
	b. Evaluate the initial phase redesign and develop path forward, if warranted, by 6/11.	• No activity this period	• Ongoing
	c. Continue to improve and enhance the content, ease of accessing, and information flow of DAQ's "Air Toxics" web site.	• No activity this period	• Ongoing
	6. Submit delegation package for		
	a. Area standards applicable to Paint Stripping and Miscellaneous Surface Coating Operations (1138 Sects 13, 14 & 15) by 1Q/11.	• Submitted on January 31	- - -
	b. Area standard applicable to Asphalt Processing and Asphalt Roofing Products Manufacturing Operations (1138 Sect 16) by 1Q/11.	• Submitted on February 16	- - -
	c. Title V-related area source subject to the municipal solid waste landfill standard (Federal Sub AAAA) by 3/11.	• No activity this period; lower priority activity	• 2012
	d. Title V-related area source subject to the hazardous waste combustor standard (Federal Sub EEE) by 3/11.	• No activity this period; lower priority activity	• 2012
	e. Title V-related area source subject to the electric arc furnace standard (Federal Sub YYYYY) by 3/11.	• No activity this period; lower priority activity	• 2012
	f. Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 3Q/11.	• No activity this period	• 12/11
	g. General Provisions (1138 Sect 3) by 4Q/11.	• On hold, pending federal amendment to General Provisions (Federal Sub A)	• Unknown

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2011 Air Toxics Strategic Plan – Mid-year *Detailed* Status Report

	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	7. Adopt new and amend existing air toxics regulations for mobile and stationary sources.		
	a. Assist in initial stringency determination between Federal Sub CCCCCC vs. existing Delaware regulations.	• On hold – the Division of Air Quality has postponed the adoption of Federal Subpart 6Cs requirements	• Unknown
	b. Submit Start Action Notices for		
	i. Adopting the area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 1Q/11.	• Initial regulatory strategy being developed	• 3Q/11
	ii. Adopting the area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 1Q/11.	• On hold, pending completion of an OTC study associated with model rule development of gasoline dispensing Stage 1 and Stage 2 controls	• Unknown
	iii. Amending the General Provisions (1138 Sect 3) by 1Q/11.	• On hold, pending federal amendment to General Provisions (Federal Sub A)	• Unknown
	iv. Amending the Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 1Q/11.	• On hold, pending federal amendment to Federal Sub B	• Unknown
	v. Adopting the area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB) by 2Q/11.	• No activity this period	• Unknown
	vi. Adopting the area standard applicable to Chemical Manufacturing Operations (Federal Sub VVVVVV) by 4Q/11.	• No activity this period	• Unknown
	vii. Amending Regulation 1140 by incorporating CAL-LEV III requirements by 12/11.	• Participated on NESCAUM's 177 States workgroup	• 12/11
	c. Complete stringency determinations for		
	i. Hazardous Waste Combustor (Federal Sub EEE) requirements in current DuPont X Station Title V permit by 3/11.	• Stringency determination completed as part of drafting permit renewal	- - -
	ii. Electric Arc Furnace (Federal Sub YYYYY) requirements during renewal of Claymont Steel Title V permit by 3/11.	• Stringency determination being undertaken during permit development	• 9/11
	iii. Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 2Q/11.	• Completed stringency determination for proposed amendment of Section 8 on June 30	- - -
	iv. General Provisions (1138 Sect 3) by 2Q/11.	• On hold, pending federal amendment to General Provisions (Federal Sub A)	• Unknown
	v. Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 2Q/11.	• On hold, pending federal amendment to Federal Sub B	• Unknown

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	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	vi. Area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 3Q/11.	• On hold, pending completion of an OTC study associated with model rule development of gasoline dispensing Stage 1 and Stage 2 controls	• Unknown
	vii. Area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 3Q/11.	• No activity this period	• 4Q/11
	viii. Area standard applicable to Gasoline Distribution Operations (Federal Sub BBBB BB) by 4Q/11.	• No activity this period	• Unknown
	d. Finalize the adoption of area source standards for		
	i. Residual risk standard applicable to Halogenated Solvent Degreasers (1138 Sect 8) by 3Q/11.	• Public workshop conducted on June 28	• 11/11
	ii. General Provisions (1138 Sect 3) by 3Q/11.	• On hold, pending federal amendment to General Provisions (Federal Sub A)	• Unknown
	iii. Case-by-Case 112(j) MACT requirements (1138 Sect 4) by 3Q/11.	• On hold, pending federal amendment to Federal Sub B	• Unknown
	iv. Area standard applicable to Prepared Feed Manufacturing Facilities (Federal Sub DDDDDDD) by 4Q/11.	• No activity this period	• Unknown
	v. Area standard applicable to Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 4Q/11.	• On hold, pending completion of an OTC study associated with model rule development of gasoline dispensing Stage 1 and Stage 2 controls	• Unknown
	e. Revise existing and develop new control strategies, as needed.		
	i. Develop path forward to amend 1138 Sect 6, if the Chrome Plating residual risk requirements are finalized in 2011.	• No EPA finalized rule to date	• Unknown
	ii. Develop path forward, if the Federal Area Source Industrial, Commercial and Institutional Boiler standard is finalized in 2011.	• On hold, EPA finalized rule (Sub DDDDD) on March 21, but EPA has delayed the rule effective date pending reconsideration of the final rule	• Unknown
	f. Complete initial stringency determination between Federal Area Source Standards vs. existing Delaware regulations and develop regulatory path forward, if necessary.		
	i. Develop regulatory path forward for Gasoline Distribution Operations (Federal Sub BBBB BB) by 3/10, if necessary.	• No activity this period	• Unknown
	ii. Develop regulatory path forward for Gasoline Dispensing Facilities (Federal Sub CCCCCC) by 3/10, if necessary.	• On hold, pending completion of an OTC study associated with model rule development of gasoline dispensing Stage 1 and Stage 2 controls	• Unknown

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2011 Air Toxics Strategic Plan – Mid-year *Detailed* Status Report

	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	g. As each residual risk and area source standard is being developed, evaluate the need for and implement outreach or education activities, if appropriate.	• No activity this period	• Ongoing
	h. Coordinate Air Toxics Area Source Program development, if any area source standards are newly promulgated or revised.		
	i. Coordinate the identification of known or potentially affected sources, update the area source inventory and send inventory report to EPA by 9/11, if required.	• No activity this period • New area source standard (Sub 7Es) promulgated on 2/17/11; no Delaware sources • New area source standard (Sub 6Js) promulgated on 3/21/11	• Ongoing - - - • 9/11
	ii. Coordinate the development and incorporation of new and newly revised standards into the Area Source Program – Implementation Plan as part of the Air Toxics Strategic Planning process.	• No activity this period	• 11/11
	iii. Update the Area Source Program – Implementation Plan, as needed.	• No activity this period	• 12/11
	i. As regulations, especially area source standards, are promulgated, evaluate the role of the ombudsman to facilitate interactions between DAQ and small businesses.	• No area source standards affecting small business were being developed during this period	• Ongoing
	8. Continue to audit inspection and maintenance (I/M) program and submit annual I/M report to EPA R3, if appropriate.	• Conducted semi-monthly audits statewide during the period • Completed draft annual I/M report	• Ongoing • 7/11
	9. Develop and implement improvements for inspection and maintenance (I/M) reporting process.	• Continued to improve I/M reporting process and formats	• Ongoing
	10. Facilitate the implementation of mobile source diesel emission reduction projects.		
	a. Facilitate the implementation of diesel retrofits.		
	i. Complete City of Newark truck retrofits by 6/11.	• Completed retrofits on 5 trucks in June	- - -
	ii. Complete additional school bus and government truck retrofits using 2010 DERA grant funding by 12/11.	• Identifying candidates for bus and heavy-duty truck retrofits	• 12/11
	b. Complete Port of Wilmington engine replacement project.	• Fourth (and final) engine replacement on hold pending scheduling of installation	• 10/11
	11. Continue to work with other State agencies on air toxics communications and outreaches.	• No opportunities found during this period	• Ongoing
	12. Continue to collaborate with other DNREC agencies on educational outreach activities associated with promoting the diesel emission reductions.	• No activity, Small Business Ombudsman on leave of absence during this period	• Ongoing

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2011 Air Toxics Strategic Plan – Mid-year *Detailed* Status Report

	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	13. Pursue potential joint outreach/educational opportunities with the Delaware Energy Office.	<ul style="list-style-type: none"> • No joint opportunities surfaced during this period 	<ul style="list-style-type: none"> • Ongoing
	14. Continue to identify and implement energy efficiency programs for the residential and commercial sectors through the Sustainable Energy Utility (SEU).	<ul style="list-style-type: none"> • Actively implemented the following programs: <ul style="list-style-type: none"> • Residential Lighting discounts • Home Performance with Energy Star • Business <i>Plus</i> • Green for Green 	<ul style="list-style-type: none"> • Ongoing
	15. Continue to provide energy efficiency/conservation education, outreach, and technical assistance to the residential and commercial sectors.	<ul style="list-style-type: none"> • Completed energy-related outreach at the Great Green Expo in March • Prepared for upcoming outreach at the State Fair 	<p style="text-align: center;">- - -</p> <ul style="list-style-type: none"> • 7/11
	16. Continue to identify and implement state facilities energy programs.	<ul style="list-style-type: none"> • Implementation of Executive Order 18 , which focuses on energy savings and green procurement in government agencies • Completed energy benchmarking of all large State-owned facilities on June 1 • Provide education to state employees 	<p style="text-align: center;">- - -</p> <ul style="list-style-type: none"> • 12/11
	17. Continue to identify and implement renewable and advanced energy technologies. Renewable and advanced technologies include:		
	a. Green Energy Program		
	i. Photovoltaic Electric	<ul style="list-style-type: none"> • Awarded 53 grants for \$931,000 	<ul style="list-style-type: none"> • Ongoing
	ii. Solar Hot Water	<ul style="list-style-type: none"> • Awarded 7 grants for \$23,000 	<ul style="list-style-type: none"> • Ongoing
	iii. Geothermal	<ul style="list-style-type: none"> • Awarded 25 grants for \$94,000 	<ul style="list-style-type: none"> • Ongoing
	iv. Wind	<ul style="list-style-type: none"> • No grants awarded this period 	<ul style="list-style-type: none"> • Ongoing
	b. Initiate low-interest financing programs for renewable energy projects through the Sustainable Energy Utility (SEU).	<ul style="list-style-type: none"> • Preparations finalized for the July 5 kickoff of a new program to financing for residential, multi-family and non-residential renewable energy projects 	<ul style="list-style-type: none"> • Ongoing

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2011 Air Toxics Strategic Plan – Mid-year *Detailed* Status Report

	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	c. Technology Demonstration/Research & Development Grant Program. This program is “on hold”, as of 1/11.	<ul style="list-style-type: none"> • On hold until further notice 	<ul style="list-style-type: none"> • Unknown
	d. Renewable Portfolio Goals	<ul style="list-style-type: none"> • Participated in monthly Renewable Task Force meetings held between January and June • Submitted legislative change for Senate Bill #124 with Senate Amendment 1- Title “<i>AN ACT TO AMEND TITLE 26 OF THE DELAWARE CODE RELATING TO DELAWARE'S RENEWABLE ENERGY PORTFOLIO STANDARDS AND DELAWARE-MANUFACTURED FUEL CELLS</i>”; bill passed by General Assembly in June 2011 	<ul style="list-style-type: none"> • Ongoing • Signed into law on 7/7
	18. Continue to identify and implement transportation programs. Transportation programs include:		
	a. Clean Cities/State Program – focusing on greater use of alternative transportation fuels.	<ul style="list-style-type: none"> • Committed to support Level 3 program for period of 11/1/10 -10/31/11 on January 21, which requires periodic reporting, coalition assistance, and optional training • Began process of Re-designation in April. Plan to include: <ul style="list-style-type: none"> • Three-year displacement process of petroleum use in transportation sector • Staffing and sustainability within coalition 	<ul style="list-style-type: none"> • 12/31 • Ongoing

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2011 Air Toxics Strategic Plan – Mid-year *Detailed* Status Report

	Implement appropriate actions to reduce the harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011 Cont	19. Implement the “Energy Assurance Updates” by providing enhanced training for emergency personnel who respond during major disruptions to the energy supply.	<ul style="list-style-type: none"> • Revised Energy Assurance Plan in February • Attended U.S. DOE-sponsored regional Energy Assurance exercise in Boston on June 16 and 17 • Began preparations for a State Energy Assurance exercise to review proceedings in situations of Nor’easters, earthquakes, etc and addressing the catastrophic power outages, fuel shortages, etc 	<p style="text-align: center;">- - -</p> <p style="text-align: center;">- - -</p> <ul style="list-style-type: none"> • 10/11
	20. Implement the “Energy Efficiency and Conservation Block Grant” programs to reduce fossil fuel emissions, total energy use, and improve transportation efficiency.	<ul style="list-style-type: none"> • All funds allocated as of June 30; projects currently ongoing 	<ul style="list-style-type: none"> • 9/12
	21. Continue to provide air toxics-related support to State through. . .		
	a. Reviewing of air permits.	<ul style="list-style-type: none"> • Identified an anomaly in a new application for a permit to construct concerning Section 11 of Reg. 1138 (Fed Sub 6Ps) on February 21 • Requested an applicability clarification from EPA Region 3 on March 20 	<p style="text-align: center;">- - -</p> <ul style="list-style-type: none"> • Unknown
	b. Providing current regulatory interpretations.	<ul style="list-style-type: none"> • Provide regulatory guidance on applicability of Section 14 of Reg. 1138 for <ul style="list-style-type: none"> • Issuing of a new operating permit associate sales of a facility • Modification of an existing operating permit • Issuing of an new permit to construction 	<ul style="list-style-type: none"> • Ongoing
	c. Advising on likely future trends and actions.	<ul style="list-style-type: none"> • No activity this period 	<ul style="list-style-type: none"> • Ongoing
	d. Providing technical support, as needed.	<ul style="list-style-type: none"> • Continued to provide technical support, as needed, for OTC’s committee developing a lightering model rule 	<ul style="list-style-type: none"> • Ongoing

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	Evaluate the effectiveness of the actions taken to reduce harm from exposure to air toxics	6/30/11 Status	Expected Completion
2011	1. Monitor, pending network review to meet changing resources, for Carbonyls and metals at one (1) air toxic monitoring station and VOCs at two (2) air toxic monitoring stations and report status of monitoring activities to EPA R3, as appropriate.	• Sampling is on schedule.	• Ongoing
	2. Track the emissions of air toxics of concern from significant sources contributing to elevated risks of exposure to air toxics.	• No activity this period	• Ongoing
	3. By September, complete a self-assessment of major stationary source air toxics reduction and outreach programs undertaken or in progress to determine effectiveness, impacts, and improvements. Incorporate results into the respective programs.	• Engineering & Compliance designated as the lead for the community outreach in support of the Claymont dust study	• Ongoing
New	4. Conduct school bus anti-idling compliance assessments to determine the effectiveness of the anti-idling requirements in Regulation 1145.	• Conducted school bus anti-idling surveys between April and June; collation of results is underway	• 9/11

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	Air toxics resource development	6/30/11 Status	Expected Completion
2011	1. Evaluate available training and encourage broader participation in risk-related training.		
	a. Continue to identify air toxics related training, workshops and forums; encourage participation, when appropriate.	<ul style="list-style-type: none"> • Provided air toxics-related input to the DAQ Training Coordinator for inclusion in the National Curriculum Training Project on June 3 • No air toxics training opportunities identified during this period 	- - - <ul style="list-style-type: none"> • Ongoing
	b. Participate in national and EPA air dispersion modeling programs or training specific to air toxics characterization.	<ul style="list-style-type: none"> • No activity this period 	<ul style="list-style-type: none"> • Unknown
	c. Evaluate the need for air toxics-related training for staff and present, as needed.	<ul style="list-style-type: none"> • Provided permitting and compliance-related input to the DAQ Training Coordinator for inclusion in the NACAA, National Training Strategy and Learning Management Systems projects • Identified air toxics related training requirements in the Annual MARAMA Training Needs Assessment • Coordinated special training requirements with MARAMA and NACAA training committees 	<ul style="list-style-type: none"> • Ongoing • Ongoing • Ongoing
	d. Determine if recently promulgated air toxics standards (MACT, Residual Risk or Area Source GACT) should be presented to staff.	<ul style="list-style-type: none"> • Determined that training on the applicability for various area source standards should be presented in the 3Q or 4Q/11 	<ul style="list-style-type: none"> • 12/11
	2. Continue to assess and pursue implementation of a process for multi-agency sharing of source information for new and existing sources, including gasoline delivery vessels.	<ul style="list-style-type: none"> • Partially completed implementation; gasoline delivery vessels data now accessible in DENs 	<ul style="list-style-type: none"> • Ongoing
	3. Develop and implement mechanisms to improve air toxics communications.		
	a. Continue to implement newly found mechanisms to improve air toxics communications between branches.	<ul style="list-style-type: none"> • No new mechanisms identified 	<ul style="list-style-type: none"> • Ongoing
	b. Continue to promote open communications between DNREC and small businesses on air toxics issues.	<ul style="list-style-type: none"> • Continued to provide communication avenues to small business on air toxics issues on an as-requested basis 	<ul style="list-style-type: none"> • Ongoing